



United States
Department of
Agriculture

Forest
Service

Manti-La Sal
National Forest

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File Code: 2820-4

Date: March 27, 2000

Mary Ann Wright
Utah Department of Natural Resources
Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
P.O. Box 145801
Salt Lake City, Utah 84114-5801

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MAR 29 2000

DIVISION OF
OIL, GAS AND MINING

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RE: Additional Information on Pines Lease (UTU-76195) Addition to SUFCO Mine (Third Submittal), Canyon Fuel Company, LLC, SUFCO Mine, ACT/04/002-SR99D

Dear Mary Ann:

We have reviewed the subject materials. Several items in our December 16, 1999 comments have been adequately addressed as shown on the attachment. The items that have not been addressed are reiterated below with some additional comments:

1. Plate 5-10B shows subsidence protection areas but there is no information presented in the text to describe how the mine plan was developed to specifically provide protection from subsidence (Comment I.1 of attachment). A description of how the subsidence protection zones in Box Canyon were determined must be added in the reserved space on pg. 5-21. This description must include the buffer distances from the stream and angle-of-draw used to determine full-extraction mining limits and an analysis of full-support mining proposed to occur beneath the protection zones regarding pillar support capabilities to prevent subsidence from ever occurring in the subsidence protection zones. Pillar support capabilities (safety factor) and pillar foundation properties must be addressed.
2. The company needs to develop a monitoring plan for the stock watering ponds.
3. The discussions on wildlife habitat must be revised to recognize the importance of perennial water and riparian vegetation (Comment II.2 of attachment). Information on elk migration routes also needs to be incorporated (Comment II.4 of attachment).
4. Vegetation monitoring in the subsidence areas must be added (Comment III.4 of attachment).
5. The hanging garden vegetation zones in Box Canyon must be identified in the vegetation section and representative sites must be mapped, photographed, and identified for monitoring (Comment III.5 of attachment).
6. The segments of riparian vegetation in Link Canyon downstream of Link Canyon Springs



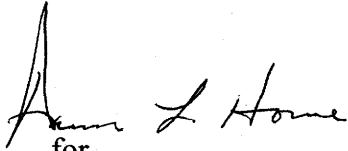
and below the old Link Canyon Mine portals need to be described, mapped, and shown on Plate 3-1. Monitoring of the riparian vegetation segments at these locations, and in the left fork of the East Fork of Box Canyon, must be monitored in conjunction with monitoring of identified water monitoring points. Canyon Fuel must make a commitment to mitigate any loss of flow or riparian vegetation attributable to mining. Canyon Fuel must recognize and document that any mitigation plans are subject to approval by the regulatory authorities and surface management agency (Forest Service).

7. SUFCO must commit to mapping of surface flow reaches in Box Canyon on a yearly basis to be completed around the first of October and compare results with precipitation data to determine if there are any mining-caused effects to perennial flow (Comment V.2 of attachment).
8. The spring in the stream channel of the small east fork of the main fork of Box Canyon below monitoring point must be monitored for flow. The stream appears to become perennial at this point (Comment V.4 of attachment).
9. The springs or locations in the East Fork of Box Canyon where the tributaries become perennial must be added to the monitoring plan (Comment V.6 of attachment). This can be accomplished by implementing item 6 above.
10. A subsidence monument is needed in the vicinity of the left fork of the East Fork of Box Canyon.
11. A conceptual cross-section of the Muddy Canyon breakout was added. The submittal does not contain adequate information to be able to evaluate the Muddy Canyon breakout. A detailed plan will be required prior the Forest Service issuing consent/concurrence. The breakout can only be approved on a conceptual basis in the MRP approval at this time. A site-specific environmental analysis will be required prior to final consent to the Muddy Canyon breakout because it was only conceptually evaluated in the Pines Tract EIS. In order to minimize delays, the detailed plans should be submitted as soon as possible.
12. The Cultural and Historic Information Section on page 4-9 needs revision. The last paragraph identifies some of the sites that are in and out of the subsidence zones, but is not complete. In addition, the second sentence states that rock shelter site 42SV2434 is unevaluated. This is not correct. Site 42SV2433 is unevaluated as stated, but 42SV2434 has been determined to be a significant site. We suggest that this be resolved by changing the last paragraph to state that information regarding the potential for specific sites is contained in the Memorandum of Agreement.
13. A statement needs to be added on page 4-10 explaining that if any of the sites sustain adverse effects from mining, treatment plans will be developed in consultation with SHPO, the Forest Service, Advisory Council, UDOGM, and consulting parties.
14. Delete the word "adversely" in the last sentence of the second paragraph on page 4-10.
15. Change the reference in the fourth paragraph on page 4-10 from "Utah State Historical

Society" to "Utah State Historical Preservation Office (SHPO)".

If you have any questions, contact Carter Reed or Jeff DeFreest at the Forest Supervisor's Office in Price, Utah.

Sincerely,



for
JEFF WALTER
Acting Forest Supervisor

Enclosure

cc:

D-2/3

Dick Manus, BLM Price Field Office

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